

EXHIBIT 1

Robert T. Mills (Arizona Bar #018853)
Sean A. Woods (Arizona Bar #028930)
MILLS + WOODS LAW, PLLC
5055 North 12th Street, Suite 101
Phoenix, Arizona 85014
Telephone 480.999.4556
docket@millsandwoods.com
swoods@millsandwoods.com
Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Debra Morales Ruiz, an individual, for herself and on behalf of and as pending Personal Representative of The Estate of Alexander Chavez; Alex George Chavez, an individual,

No.: CV-23-02482-PHX-SRB (DMF)

DECLARATION OF SEAN A. WOODS

(Assigned to the Honorable Susan R. Bolton and referred to the Honorable Deborah M. Fine)

County of Maricopa, a governmental entity; Brandon Smith and Jane Doe Smith; Paul Penzone and Jane Doe Penzone; David Crutchfield, an individual; Lisa Struble, an individual; Kyle Moody and Jane Doe Moody; Arturo Dimas and Jane Doe Dimas; Tyler Park and Jane Doe Park; Gerardo Magat and Jane Doe Magat; Daniel Hawkins Jr. and Jane Doe Hawkins; Javier Montano and Jane Doe Montano; James Dailey and Jane Doe Dailey; Trevor Martin and Jane Doe Martin; Greggory Hertig and Jane Doe Hertig; John Chester and Jane Doe Chester; Jorge Espinosa Jr. and Jane Doe Espinosa; Morgan Rainey and John Doe Rainey; Stefanie Marsland and John Doe Marsland; and, John and Jane Does 1-40.

Defendants.

I, Sean A. Woods, declare as follows:

6 3. Because the name “Jorge Espinosa” is an extremely common name in the
7 Phoenix area, the background check and associated searches yielded an extremely high
8 number of results, thus making a determinization as to the location for Defendant Jorge
9 Espinosa Jr. to become extremely impracticable.
10

I declare, under penalty of perjury, that the foregoing is true and correct to the best
of my knowledge and belief.

EXECUTED this 29th day of May, 2024

/s/ Sean A. Woods
Sean A. Woods